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ABSTRACT

This paper sets in perspective the evolution of accreditation trends in the U.S. and considers present concerns about accreditation. The authors examine the impact of social change on accreditation, ways professions have influenced educational programs and institutions through accreditation procedures, the influence of the courts on the role of accrediting agencies in society, and federal involvement in accreditation. The authors conclude that unless accrediting agencies are able to reinvigorate the accrediting process, with emphasis on national welfare, the public could insist on other means of external monitoring of higher education. (HS)

A Current Perspective on Accreditation

Frank G. Dickey and Jerry W. Miller

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A Current Perspective on Accreditation

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Frank G. Dickey
Jerry W. Miller

Foreword

This paper sets in perspective the evolution of accreditation trends in the U.S. and considers present concerns about accreditation. Frank Dickey, executive director, and Jerry Miller, associate director of the National Commission on Accrediting, examine the impact of social change on accreditation, ways professions have influenced educational programs and institutions through accreditation procedures, the influence of the courts on the role of accrediting agencies in society, and federal involvement in accreditation. The authors conclude that unless accrediting agencies are able to reinvigorate the accrediting process, with emphasis on national welfare, the public could insist on other means of external monitoring of higher education.

This is the seventh in a new series of Clearinghouse reports to be published by the American Association for Higher Education (AAHE). In addition to the report series, the Clearinghouse also prepares brief reviews on topical problems in higher education that are distributed by AAHE as *Research Currents*.

Carl J. Lange, *Director*
ERIC Clearinghouse on Higher Education
November 1972

1. Introduction

In most nations the governance of higher education depends upon ministries of education, whether national, state, or provincial. The final legal responsibility for approving the appointment of professors, the introduction of new programs of study, the authorization of funds to support the operations of the universities, as well as the chartering of new institutions is generally assigned to these ministries. Informal and extra-legal forces naturally exist in this form of governance, but in most countries the legal authority for education resides with ministries of education.

In contrast, the governance of higher education in the U.S. is distinct and different from that prevailing in all other countries of the world. With no Ministry of Education, the legal authority for education resides in each of the 50 states. Each state, as well as the U.S. Congress, has the power to charter educational institutions; each, seemingly unhampered by tradition, has exercised this power, occasionally with near profligacy. Chartering procedures in many states permit diploma mills to flourish. The result is an unparalleled diversity of institutions awarding similar academic degrees. In this respect, chartering of institutions as well as their subsequent accreditation by state governments have not been significant forces toward establishing and maintaining standards of quality in postsecondary educational institutions. These efforts have been not only grossly uneven, but state activities in accreditation also have achieved little status among either state governments or federal agencies. Among state agencies, only the Board of Regents of New York State has been recognized by the U.S. Commissioner of Education for purposes of general accreditation of colleges and universities (89, p. 1).

2/A CURRENT PERSPECTIVE ON ACCREDITATION

State government licensure bodies rely on accreditation status granted by nongovernmental agencies to establish eligibility to sit for examination as well as for other purposes (93, p. 41). While this diversity among our postsecondary institutions has brought social gains unequalled in any other nation, it has created a dilemma in the governance of higher education—a dilemma with which no other nation has been confronted. In response to the need for quality assessment in the governance of postsecondary education, the process known as accreditation has developed.

Through accreditation, institutions serving the public—colleges and universities, elementary and secondary schools, hospitals, clinics, and scientific laboratories—are identified as meeting certain standards. Accreditation is thus a method of protecting the public by identifying quality institutions and helping to maintain and raise institutional standards. It complements but differs from licensure or certification, where the states and some professions identify *individuals* who are competent to perform professional duties.

Accrediting as practiced in the U.S. is a nongovernmental activity and is the closest American equivalent to the system of external examinations and government supervision of universities employed by other nations. Inasmuch as the accrediting activities are independent of government control or jurisdiction, accreditation may be described as the primary method of collective institutional self-governance in higher education for this nation. Accreditation also permits and encourages the professions to contribute to the assurance that their future members will be adequately educated and prepared to serve societal needs.

Historically, the accrediting associations have been called "voluntary" organizations; however, in view of the following position regarding the use of the term "voluntary," it seems appropriate to refer to these groups as "nongovernmental." Pennock and Chapman (63, p. LX) say:

> It has become clear that the term 'voluntary' suffers from the same disease that caused a change from the term 'private' when applied to associations. Any association by definition has at least an element of voluntariness. And voluntariness, like privacy, is becoming more and more a matter of degree. Moreover, there are both historical and analytic dimensions to the meaning of 'voluntary.' Political and behavioral scientists tend to restrict the con-

> cept to the kinds of private organizations in which the presence of consent and spontaneity is pronounced, while political philosophers are inclined to use 'voluntary associations' to cover all those private activities that enter into the composition and operation of a plural society.

The role of accreditation in American society has grown to the extent that virtually every institution and many programs of study are forced to seek accredited status. Institutions may exist but few thrive without accreditation. Seen in this light, it is a misnomer to term accreditation voluntary. The function accreditation serves must be performed for a complex society. If it were not performed by private groups, government agencies would have to step in to fill the void. Because of its growing social role, many have termed accreditation a quasi-governmental function. But accreditation also serves narrower, less public functions.

Thus, historically, accrediting agencies in education have faced, like a Janus, in two directions at once: first, inwardly toward their own institutional and professional members; secondly, externally to the public. But these orientations have not been symmetrical by any means. Primary emphasis in the less recent past has been on internal affairs and institutional improvement and welfare. The accrediting business approximated a closed community with specially vested, highly controlled, professional interests. (82)

In the past two decades this imbalance has shifted and been redressed to the point where the prime emphasis of accrediting agencies is viewed as a social obligation and there have been moves to broaden representation of accrediting commissions to include the public. This is because education has come to be recognized as indispensable to private individual benefit and to the public welfare. There is a national commitment to education, symbolized most visibly (a) by the increased funds devoted to education in general at all levels, from the primary grades through to graduate and postgraduate instruction and research, and (b) by the increased national concern for educational fulfillment of all those disadvantaged by poverty, prejudice, or physical handicap.

The Federal Government has a concern for spending the tax dollar wisely. The accrediting agencies have been moved, therefore, to improve their own work to ensure that accredited institutions really deserve the Federal funds they seek and receive.

4/A CURRENT PERSPECTIVE ON ACCREDITATION

Increasingly, local, state, and federal government view accrediting groups with warm interest and close scrutiny and are ready to criticize, correct, and even supplant voluntary accrediting agencies that lack integrity, are possessed of extensive weakness, have invalid standards, are overly rigid in a rapidly changing society, or that, in any case, are irresponsible and capricious in carrying out their public responsibility.

Accrediting, then, is accountability for stewardship of a public trust and is another manifestation of the fundamental precept of democracy: liberty under law or freedom circumscribed by self-imposed restraints.

2. Historical Context

In a paper prepared for the National Commission on Accrediting in 1966, Allan M. Cartter said:

> Accreditation is the embodiment of the social institution that one cannot live comfortably with, and yet cannot live without. The history of accrediting reveals a periodic reversal of perceived needs and accepted customs. Nowhere is this swing of the pendulum clearer than in the relationship of accreditation to govment. (75, p. 58)

Cartter continues by saying that a review of the history of accreditation from the late nineteenth century up to the present indicates "the pendulum's arc is compressing, and the swings are becoming somewhat sharper." Historically, one can divide the period into four somewhat arbitrary phases: to 1914, a growing pressure for Federal accreditation; 1914 to 1940, the "Ph.D. Trust" and the growth of regional accreditation; 1940 to the early 1950's, growing dissatisfaction with accreditation; 1952 to the present, the uneasy domestication of accreditation and the struggle for control of coordination, with growing Federal involvement in the accrediting arena.

To 1914

The accrediting movement in the U.S. as it relates to higher educational institutions had its origins in the need for reliable bases upon which the growing number of institutions calling themselves "colleges" might be appraised. Much of the early history of

higher education in this nation centered on the question: "What is a college?" By the end of the nineteenth century the need for an answer to this question was urgent; and by the close of World War I the rise of complex universities with numerous professional programs had greatly complicated the accrediting problem.

From the founding of Harvard College in 1636 to near the close of the nineteenth century, there was little effort to standardize, rate, or classify collegiate institutions; however, even before the concept of accreditation had developed in this nation, the need for differentiating between a college and other types of educational institutions had arisen. The U.S. Bureau of Education—established in 1867 as a department but changed to a bureau in the Department of the Interior in 1868—was the first agency of real significance to undertake the task of establishing a definition for "college" and "university" (72, p. 642).

One of the important functions of the U.S. Bureau of Education was that of summarizing the educational activities of the country. Once the definition of college and university was arrived at, it was necessary for the Bureau to ascertain the number of colleges, the enrollments in the institutions of higher education, and similar facts. In an effort to avoid ultrafine distinctions, the Bureau established the policy of listing any institution authorized to give degrees that reported students in attendance.

In 1910 the office of Specialist in Higher Education was added to the Bureau table of organization. At that time, the Bureau's list of colleges included 602 institutions, some of which were not colleges as the term is used now. To facilitate deletion of some of the questionable institutions from the list, the following definition was developed: "An institution in order to warrant its inclusion must give degrees; must have definite standards of admission; must give at least two years of work of standard college grade; and must have at least twenty students in regular college status" (73, pp. 884-85). The definition, consisting of a list of characteristics, established the idea of acceptable "standards." As a result of this definition, the list of the Bureau was reduced from 602 institutions in 1910 to 563 by 1915. (For a comprehensive account of the activities of the U.S. Bureau of Education in connection with institutional lists up to 1917 see item 9 in the bibliography.)

The first U.S. Bureau of Education Specialist in Higher Education was Kendric C. Babcock. In 1911 Babcock prepared a classification of colleges and universities in cooperation with the Association of American Universities. This list was to aid the

growing graduate schools to determine what colleges were able to adequately prepare students for graduate work. The records of students in the various graduate schools were examined and the colleges were classified on the basis of the success of their graduates in courses leading to the graduate degrees. Colleges whose graduates attained the master's degree in 1 year were rated as Class I, and so on through Class IV. This latter class included those institutions whose graduates were found to be unprepared to do graduate work (73, p. 884-85).

Classification was completed on October 21, 1911. Copies of the proof were sent to various collegiate deans for their criticisms and in November 1912, a revision in galley form was sent to officers of the graduate and professional schools for additional comments. While this revision was underway, the newspapers secured information about the report. The publicity that followed resulted in tremendous political pressure upon President Taft not to release the report, as a result of which he requested the Commissioner of Education to withhold publication. President Wilson, despite the plea of the Association of American Universities (AAU), subsequently upheld Taft's decision. Since that time no attempt has been made by the Bureau of the present U.S. Office of Education to compile a classified or "accredited" list on its own responsibility. (For a comprehensive account of the activities of the U.S. Bureau of Education in connection with institutional lists up to 1917 see item 9 in the bibliography.) At the time of this writing the Office of Education relies on the considered judgment of a number of nongovernmental accreditation organizations.

When the Bureau of Education failed to produce a definite categorization of colleges and universities, a committee sponsored by the U.S. Bureau met to discuss what could be done along these lines. Many organizations sent representatives to attend a meeting in Washington during November 1914, including the New England Association of Colleges and Preparatory Schools, the North Central Association of Colleges and Secondary Schools (35, pp. 24-46), the Association of Colleges and Preparatory Schools of the Middle States and Maryland (66, p. 26), the Association of Colleges and Secondary Schools of the Southern States (67, pp. 29-103), the Association of American Universities, the National Association of State Universities, the American Medical Association, the Society for the Promotion of Engineering Education, and the Association of American Colleges.

Strong opposition by the associations was voiced to any classification of colleges as had been proposed in Babcock's original list. It was finally agreed that the U.S. Bureau of Education should furnish data on the colleges and universities of the nation regarding enrollment, offerings, etc. and that each college or university should make its own classification of institutions. This project was carried out under the direction of Samuel P. Capen, the Specialist in Higher Education of the Bureau at that time. His report, containing a suggested list of standards and data about 252 colleges of arts and sciences, was published by the Bureau as *Bulletin No. 30, 1918* (87).

It should be clearly understood that the classification of colleges was not the only force working toward some form of "standardization" of higher education institutions. The rapid growth in the number and size of colleges and universities compelled each institution to maintain relations not only with secondary schools but also with other colleges and universities as well. The problems of initial admission were compounded by questions of credit transfer and various intercollegiate relations.

There were several organizations that might conceivably have developed into accrediting agencies; however, for various reasons they did not pursue this activity beyond their own needs. For example, the Carnegie Foundation for the Advancement of Teaching was established in 1910 to determine institutions eligible to participate in a retirement plan under the auspices of the Foundation. The question was practically solved by the adoption of the definition of colleges existing in the statutes of New York State, which included the following provisions: $200,000 of productive endowment; not less than six full chairs of instruction; 4 years of high school preparation required for admission (or 14 units); and 120 semester hours required for graduation. In addition, the conditions attached to participation in the retirement system excluded from its benefits institutions under the control of a denomination or which required their trustees or officers to belong to a specific denomination (95, pp. 33-38).

Many expected the list developed by the Carnegie Foundation to become a national list of accredited institutions. In fact, the larger graduate schools would have welcomed such a solution to the problem, especially after it proved impossible for the U.S. Bureau of Education to publish such a list. However, the Foundation did not assume this responsibility and other sources had to

be sought for providing the quality assurances needed by the American public (10, pp. 79-80). Kendric Babcock wrote in the 1912 report:

> To deny that the term (college) is fully applicable to any institution calling itself a college is to offer serious affront to individuals connected with the institution, to all who hold its degrees, and to all their friends. Yet definition, or at least exact discussion, is absolutely necessary if an institution is to deal honestly with the great public to whom it appeals and with the students whom it receives into its classes.

1914-1940

The edict of President Taft shifted the publication of Babcock's work to a voluntary association. When Babcock became Dean at the University of Illinois in 1913, he was immediately appointed chairman of an AAU committee to classify colleges. The first published AAU list of colleges approved for the pregraduate training of scholars was issued in 1914. Babcock's work was not wasted, for in the same year the Bureau of Education provided this information to the War Department, which used it as the basis for a list of 350 institutions accredited by the U.S. Military Academy in excusing graduates from entrance examinations to West Point.

The AAU continued its evaluating function until 1948. Beginning with the North Central Association in 1913, the regional associations took on the general collegiate accreditation function over the next several decades. The Office of Education displayed little concern for accreditation for nearly 40 years. However, at the request of the Chief State School Officers in 1937 it did sponsor a series of conferences, concluding with a publication in 1940 on *Collegiate Accreditation by Agencies Within States*. Interestingly, this document recommended that accreditation should be a responsibility of the states, and that private organizations should be concerned primarily with the improvement of education rather than accreditation. During this period both the regional accrediting associations (with their concern for institutional quality) and also the professional accrediting bodies (concerned with programmatic assessment) grew and thrived.

1940-1952

During the period from 1940 to 1952, three developments on the Federal level indicated a growing reliance of government on voluntary accrediting procedures. First, the Selective Service Act of 1941 granted temporary deferment to students in good standing who were pursuing *degree courses in collegiate institutions.*

Second, the Serviceman's Readjustment Act of 1944 and Public Law 16 of the 78th Congress for disabled veterans provided educational benefits for an eligible veteran at any approved college, school, or on-the-job training establishment. Both acts were administered by the Veterans' Administration. Colleges were approved by State agencies, with the Veterans' Administration having the authority to "recognize and approve" additional institutions that "shall be deemed qualified and approved to furnish education or training to such persons as shall enroll" – a broad power indeed.

Third, and most important, the Korean War G.I. Bill (1952), recognizing the difficulties encountered under the earlier G.I. Bill in listing approved institutions, required that the Commissioner of Education "shall publish a list of nationally recognized accrediting agencies and associations that he determines to be reliable authority as to the quality of training offered by an educational establishment." Accordingly, the Office of Education published in October 1952 a set of criteria for nationally recognized accrediting agencies. Among the more important criteria for recognizing such an agency were: (a) that it be national or regional in scope, and (b) that it "has gained acceptance of its criteria, methods of evaluation, and decisions, by educational institutions, practitioners, licensing bodies and employers throughout the United States."

Another development that predates this period was the publication by the Office of Education of an annual *Education Directory: Part 3, Higher Education.* This publication has taken on increased importance in recent years. The *Directory* listed all recognized institutions. The basis for inclusion has traditionally been twofold:

- Institutions accredited or approved by a nationally recognized accrediting agency, a State department of education, a State university, or operating under public control, are eligible for inclusion.

- Institutions not meeting requirements of criterion 1 are eligible for inclusion if their credits are accepted as if coming from an accredited institution by not fewer than three fully accredited institutions.

This latter criterion has undergone a subtle modification within the past few years and will be discussed later in this presentation.

The period of 1940-1952 was also one of consolidation of the regional associations, at the end of which all parts of the country were encompassed by one of the six regional bodies, even though most of the regions had been accrediting for several decades. However, it was also a period of disenchantment, marked by the withdrawal of the Association of American Universities from the evaluation field and culminating in the founding of the National Council on Accreditation for Teacher Education over the opposition of many educators from the liberal arts colleges. It also saw the establishment of the National Commission on Accrediting.

The New England Association of Colleges and Secondary Schools, established in 1855, was the first of the regional associations, but it was the North Central Association of Colleges and Secondary Schools that issued the first list of regionally accredited colleges and universities in 1913. Interestingly, the first established regional association—the New England—was the last to begin actual accreditation, waiting until 1952 to begin the process (81, p. 37).

Each of the six regional associations of colleges and schools in the U.S. grants accreditation to those institutions that possess adequate educational purposes, that accomplish these purposes satisfactorily, and that appear able on the basis of their organization, staff and support to continue to fulfill these purposes for a reasonable period of time. Accreditation by a regional association makes an educational institution eligible for membership in the association, and continued membership is dependent upon continued compliance with accrediting standards.

Regional accreditation is one of three types of approval that influence American colleges and universities:

- One form of approval is provided by the states. In addition to chartering institutions of higher education within their borders, the states possess the legal authority and exercise it to one degree or another in regulating and approving the continued operations of these educational institutions.

- Another form of accreditation is conducted by a score or so of professional or specialized organizations in such fields as architecture, dentistry, law, and social work. The organizations represent the interests of both practitioners and educators of these professions in evaluating and assuring the quality of professional education.

- The third type, regional accreditation, is conducted by *institutions of higher education themselves* as a form of collective self-governance or self-regulation. It provides balance to the other types of accreditation, for its regional base tends to overcome the local variation common to state accreditation, and its institution-wide scope tends to counteract the specialized interest implicit in professional accreditation.

Over 2,000 universities, colleges, junior colleges, and technical institutes in the U.S. and its territories are currently accredited by the regional associations. These institutions comprise over two-thirds of those listed by the U.S. Office of Education as institutions of higher education.

The regional associations are voluntary organizations, unrelated to any political or religious organization or position. They are desirous of helping all educational institutions in their areas, although all types of institutions are not eligible for membership; and they evaluate and periodically re-evaluate their member institutions as part of their aim to improve education. "We believe that the basic purpose of institutional evaluation in higher education is to help improve the total effectiveness of colleges and universities," states the Commission on Colleges and Universities of the North Central Association. Similarly, the Commission for Senior Colleges and Universities of the Western Association holds that accreditation "certifies that a college meets minimum standards of academic excellence, and more important, it encourages and assists the college to raise its academic standards ever higher above the minimum."

In brief, the regional associations see accreditation as a *means* to their goal of educational improvement rather than as the *goal* of improvement. "Thinking of accreditation simply as conformity with quantitative standards impairs its usefulness as an educational tool," states the Federation of Regional Accrediting Commissions of Higher Education, which views accreditation "as a constructive process through which an institution clarifies its insights, gains increased perspective, and increases its effectiveness."

Beyond this purpose of educational improvement, regional accreditation serves a variety of other functions. Most significantly, through the lists of accredited institutions, it aids prospective students, their parents, guidance counselors, admissions officers and registrars, and philanthropic foundations. Regional accreditation also indirectly aids the professional accrediting agencies that are concerned with the quality of higher education on a national scale and are interested in the total performance of institutions of higher education.

It should be noted, however, that general accreditation by the regional associations is not identical to specialized accreditation by professional accrediting agencies. The regional associations accredit an institution as a whole, while the professional agencies accredit specific educational programs within the institution. Specialized or professional accreditation is a means of protecting the public against professional incompetence by assuring that professional education meets the needs of society and of the profession. Because of this special emphasis of professional accreditation and its significance for certification and licensure in several professions, the Federation of Regional Accrediting Commissions of Higher Education has stated that "the general accreditation of the institution as a whole is not and should not be interpreted as being equivalent to specialized accreditation of each of the several parts or programs of the institution," and that colleges and universities should not consider regional accreditation "as validating a specialized program in the same manner and to the same extent as specialized accreditation."

All six regional associations accredit and periodically reevaluate both secondary schools and postsecondary institutions of education. In addition, one of them—the Southern Association—accredits elementary schools. All associations delegate the two major tasks of accreditation—the setting of standards and the evaluation of institutions in the light of these standards—to separate commissions at the secondary and higher education level.

One commission is responsible for all institutions of higher education in each of five of the associations. In the Western Association, two commissions operate at the higher education level: the Accrediting Commission for Junior Colleges and the Accrediting Commission for Senior Colleges and Universities. Both the New England and the Southern Associations have established separate commissions to accredit postsecondary institutions offering occupational education.

To coordinate their policies and planning, the commissions of the six associations have formed the Federation of Regional Accrediting Commissions of Higher Education. The Federation does not accredit institutions; rather it "codifies and develops general principles and procedures for institutional evaluation and accreditation" toward the establishment of "a national consensus for regional application."

Around the turn of the century, other developments were taking place that greatly influenced the accreditation movement. The low state of medical education in general was being deplored. The American Medical Association (AMA) was being reorganized with the creation of the Council on Medical Education. This resulted in 1905 in the first Congress on Medical Education and a published classification of medical schools based solely on the percentage of licensure examination failures for each school. Subsequently, the AMA began a rating system based on inspection of medical schools. (85, p. A-3)

This activity on the part of the AMA, coupled with the study of medical education by Abraham Flexner, "has probably exerted more influence on the course of specialized accreditation, as it has been developed in the United States, than has any other single program of accreditation. This influence extends beyond the health fields" (85, p. A-1). The dramatic success of organized medicine in forcing the closing of inferior medical schools and in upgrading medical education established the precedent for other professions to become involved in establishing and maintaining educational standards for their future members. The professions of dentistry (1918), law (1923), engineering (1936), and pharmacy (1940), following the example of medicine, were among the first groups to start accreditation programs (55). Currently, the National Commission of Accrediting recognizes agencies and associations to accredit in 37 professional or occupational fields. However, it was not until the post-World War II period that institutions of higher education began to feel the real impact of the growing numbers of professional and specialized accrediting efforts; the growing concern of the administrative officers of the complex institutions brought about the formation of yet another agency.

The proliferation of accrediting agencies had created problems for the institutions of higher education. In an effort to alleviate some of the discontent about the accrediting movement, the National Commission on Accrediting was established in 1949. The

Commission has assisted in decreasing duplication and multiplication of inspections and reports required of the institutions and has also brought about greater flexibility in accrediting standards.

In one way of viewing the situation, the Commission can be seen as one of the multitude of organizations that arose from the ebb and flow of educational ideas; it was a result of the ebbing of enthusiasm during the past three decades for the idea of "standardization" in American education. Over 60 years ago the demand for greater order in education brought about the accreditation of American schools and colleges. Accreditation continued to meet this need for standards; however, in more recent times the ideas of educational order and standards have been superseded in importance by the concepts of innovation, diversity, experimentation, and autonomy. On the ground swell of this change, the National Commission on Accrediting came into being.

In retrospect, standardization in American education was a necessary outcome of the requirement during the nineteenth century for order in new areas of American life: agreement was needed on the standard width of American railroad tracks; consensus was needed on standard time; the nation was becoming aware of the efficacy of tools and machines with interchangeable parts. In American education, however, major questions existed about the characteristics of secondary schools and colleges. Which institutions, in fact, were colleges? The well-established literary colleges knew the answer—but not the upstart land-grant institutions, the normal schools, or the first "junior" colleges. To gather statistics, the Federal Government needed definitions for higher education; to dispense aid, the new philanthropists needed standards of academic institutions; to admit American students for advanced degrees, European universities needed lists of approved colleges.

The revolt by college and university presidents against accreditation, which had been brewing as early as 1924, first developed a head of steam in 1938—a decade before it was to erupt into the National Commission on Accrediting. The strategy of the revolt was simple: the presidents would turn the tables on accreditation by creating their own agency to accredit accrediting agencies. Their counterattack started in the Association of Land-Grant Colleges and Universities and the National Association of State Universities, which created a Joint Committee on Accrediting and charged it to prepare a list of approved accrediting agencies with

which member institutions would be encouraged to cooperate. "As a long-time policy," the associations agreed, " . . . the committee should direct itself, among other things, toward an elimination of some of the existing accrediting agencies if possible, simplification of the procedures, reduction of duplication, removal of dictation from groups outside the educational field, and restoration of responsibility to states and institutions"—a list of functions that was almost identical to the one proposed later for the National Commission.

Under the chairmanship of John J. Tigert, president of the University of Florida and former U.S. Commissioner of Education, the five members of the Joint Committee found themselves in unexplored territory. They considered the possibility of outflanking the accrediting agencies by organizing the state colleges and universities to undertake their own accreditation. They debated the approach of helping the agencies consolidate their questionnaires—a task the American Council on Education would later attempt. They weighed the question of recognizing only agencies which charged no fees to evaluate institutions. "We are marching through a No Man's Land without guns," President Tigert declared. "The accrediting agencies say that we are merely throwing brickbats. Others who are radical regarding accrediting agencies think we are throwing bouquets."

To the radicals who urged the abolition of accreditation, the Committee made a disappointing decision: instead of examining each existing accrediting agency for approval, it would simply issue a list of all agencies with which member institutions of the associations were already cooperating. However, to hold the line on the creation of more accrediting agencies, the Committee asked institutions not to cooperate with new agencies until it had investigated them. Even with this policy, the Committee encountered difficulty. When it recommended against cooperation with the American Chemical Society, for example, some presidents found to their consternation that their chemistry faculties had already cooperated and their programs had been approved. Most presidents were unwilling to have their institutions reject this newly gained status. Thus, within a year, the Committee added the Society to its list.

In other ways the Committee was more successful. Two additional organizations—the Association of American Universities and the Association of Urban Universities—joined in its work. It consolidated accreditation in several professional fields by denying

recognition to competing accrediting agencies, and it encouraged several other professional organizations to help raise educational standards in ways short of accreditation. However, following World War II, with several of the influential Committee members ill or near retirement, further action was necessary. Some of the existing accrediting agencies sought to expand their work; new agencies in several professions were initiating accreditation; and most significantly of all, the Association of American Universities, whose accreditation of colleges had stood partially as a countervailing force to professional accreditation, in 1948 voted to abandon its accrediting activities. This action of the AAU left the colleges and universities, as one administrator saw it, "without any agency through which to meet the pressure of professional organizations for funds as over against the liberal arts." The only existing substitutes were the regional associations of colleges and schools, only four of which were then involved in accreditation. In petitioning the AAU to reconsider its decision, one of the four warned that regional accreditation would not be a satisfactory alternative to AAU approval.

Faced with this crisis, college administrators sought new mechanisms to regulate accreditation. Early in 1949, through the initiative of the American Council on Education, the regional associations formed a National Committee of Regional Accrediting Agencies to help coordinate their efforts and to publish a national list of their member colleges. A few months later, the idea of the National Committee on Accrediting was proposed by the Joint Committee on Accrediting.

By the middle of 1950 the constituent member associations had approved the Commission's constitution, and by November of that year 640 colleges and universities had joined. Although there was no unanimity as to what specifically should be done about accrediting, it was clear that college and university presidents agreed that something needed to be done.

The Commission's first action was similar to that of the Joint Committee. It asked its member institutions not to invite new agencies to their campuses without advising the Commission. The Commissioners were unwilling, however, merely to hold the line on new agencies. They wanted to reform or, in some cases, abolish existing accreditation. In particular, many of them agreed that the role of the professional agencies in accreditation should be reduced and that their function should be assumed by the regional associations.

This issue of the respective roles of the professional and the regional agencies proved to be the most crucial in the Commission's history. It raised fundamental questions about the purposes and uses of accreditation in American higher education, and about the control of professional education in American society. The issue was joined in 1952; by 1954, it had been resolved. Because of its significance, the developments of those few years are worthy of special attention to understand the trend of accreditation and the activities of the National Commission since that time.

The Struggle for Control of Accreditation (1952 to date)

The dilemma for American colleges between specialized or professional accreditation and general or institutional accreditation was characterized by a representative of the Commission in this way: "One may view a university as an arrangement for expediting administration of autonomous faculties, or it may be viewed as an institution that has purposes and values greater than the sum of its parts. Under the first view, we shall have segmental accrediting. Under the second, we shall have institution-wide accrediting. Who is to decide what a university is?"

In 1952, the Commission attempted to decide the answer to this question. It resolved "to have those agencies which now deal with segments of higher education serve in an advisory capacity to the regional associations, and reduce or eliminate their direct accrediting relationships with the colleges and universities." It voted that, except at its discretion, professional agencies should make no more charges for accreditation after January 1954 and, unless the Commission approved, they should obtain information about institutions only through the regional associations. The Commission recommended that until arrangements could be devised for the transfer of professional accreditation to the regional associations, its member institutions should continue to deal with professional accrediting agencies in fields influenced by state licensure—such as architecture, engineering, law, and the health professions. But it advised seven professional agencies—in business, chemistry, forestry, journalism, librarianship, social work, and teacher education—to stop accreditation and to work instead with the regional associations; and it requested its member colleges and universities to stop dealing with these seven agencies with respect to accreditation.

It is safe to say that no other action of the Commission before or since has raised so much conflict. By its decision the Commission was attempting to bring order into accreditation; yet it lacked the mandate of law and, at least to the accrediting agencies, the aura of legitimacy.

Faced with the Commission's ruling, most professional agencies were willing to visit institutions in coordination with the regional associations, but they maintained their right to grant separate accreditation to professional schools and professional programs. For their part, the regional associations had agreed through their National Committee of Regional Accrediting Agencies to develop arrangements for the coordination of accrediting activities in fields closely related to the liberal arts. However, not all of them were prepared to be assigned these accrediting activities by the Commission.

The success of the Commission's move was to hinge primarily on the support of its member colleges and universities. In joining the Commission, they had agreed to consult with it before taking action contrary to its rulings. Many institutions were unsure about severing relations with the agencies; some notified the Commission of their intent to continue these relations; and several considered withdrawing their support from the Commission. "If enough colleges and universities do not like, or do not comply, with our recommendations, the Commission will have to change its program," one Commission representative observed. "It looks to me," he warned, "that we may have stepped too far."

The reason for his concern soon became apparent. Although the Commission undoubtedly represented the views of many presidents that professional accreditation should be abolished, these views were not shared by many professors. Unlike administrators, faculty members did not view all professional accrediting agencies as interloping organizations, interfering in educational decisions. Indeed, many deans and professors were themselves members of the professional organizations, and in a number of the agencies they determined accrediting policy. Hence, at one of the most influential public universities, a faculty committee recommended to the president that the university oppose the Commission's recommendation. "The Committee believes that, on the whole, society and the interests of institutions are better served by the present scheme than by the one proposed by the Commission," it stated. "The cure for the allegedly sick child is not the administration of a lethal dose of medicine."

In addition to this resistence among its own member institutions the Commission faced two other setbacks. It had expected that the U.S. Office of Education could assign its own activities of recognizing accrediting agencies over to the Commission, but in 1952, under Public Law 82-550, the Commissioner of Education was directed to publish a list of accrediting agencies. The subsequent list included all of the professional agencies of concern to the National Commission. Finally, the National Commission had hoped for a sizable foundation grant to enable the regional associations to assume their newly prescribed responsibilities. Funds for this effort were not forthcoming. Two months before the deadline of January 1954, the executive committee of the Commission announced that the deadline was superseded.

The Commission would henceforth continue to place major responsibility for accreditation on the regional associations, but it would not expect them to supervise the professional agencies nor to assume the latter's accrediting functions. Instead it would expect all agencies to improve and coordinate their own activities. "Up to now," stated the Commission's first executive secretary, Fred O. Pinkham, "the Commission has stood *against* abuses in accrediting. It must continue to do so. But it must also now stand *for* good accrediting." His successor, William K. Selden, agreed that the Commission must take a new tack. "Accrediting is so woven into the social fabric of higher education that its eradication is an impossibility," he averred. "The responsibility of the National Commission on Accrediting is to fill a place of leadership by formulating sound principles for accrediting and by serving as a guide and friendly counselor for all the diverse and numerous groups interested in accreditation."

Evolution of Accrediting Groups

Even though the professional agencies had not agreed to refrain from accreditation during these early years, the Commission made progress in several other ways. It held meetings and negotiations with all of the accrediting agencies and numerous other organizations and alerted them to the concerns of college and university educators; it attracted national attention to problems of accreditation; it helped to stimulate the coordination of visits of professional and regional associations; and, internally, it attracted two additional associations—the American Association of Junior

Colleges and the Association of Teacher Education Institutions (now the American Association of State Colleges and Universities)—into its efforts and membership.

Once the issue of professional accreditation had been settled, the next major question the National Commission faced was that of professional accreditation in teacher education. For a while, the possibility existed that this question would wreck the Commission; but in 1956, after numerous conferences and extensive negotiations, it finally agreed that accreditation of teacher education serves social interests. Upon securing certain changes in the structure of the National Council for Accreditation of Teacher Education, it then granted recognition for accreditation in this field. In the same year, the Commission began publishing an annual list of agencies that it recognized for accreditation, a list limited initially to the six regional associations and professional agencies in nineteen fields. A year later it finally adopted formal criteria for the recognition of accrediting agencies.

Since that period, the Commission's achievements can be grouped into three major types of activity. First, the Commission has attempted to reach a consensus for American higher education on a rationale or philosophy of accreditation. Second, it has become the center of communication and regulation of accreditation. And third, it has endeavored to stimulate improvement of accreditation.

While organizational developments in regional associations, specialized accrediting bodies, and coordinating agencies (the National Commission on Accrediting and the Federation of Regional Accrediting Commissions of Higher Education) are significant during this period, other developments are perhaps even more important.

Federal Involvement

While the Korean War G.I. Bill required the Commissioner of Education to approve accrediting agencies—although not to accredit institutions themselves—Federal legislation since 1958 has made accreditation (or other "recognition") a more sensitive issue. The National Defense Education Act of 1958 defined institutions of higher education as all accredited public or non-profit institutions offering degrees or "not less than a two-year program

which is acceptable for full credit toward such a degree." If an institution was not accredited, it could be classified as eligible if (a) the Commissioner determined that there was satisfactory assurance that it would receive accreditation within a reasonable period of time, or (b) if student credits "are accepted on transfer by not less than three institutions which are so accredited." In addition where accreditation did not exist for a particular category of colleges, the Commissioner:

> . . . shall, pending the establishment of such an accrediting agency or association, appoint an advisory committee, composed of persons specially qualified to evaluate training provided by schools in such category, which shall (i) prescribe the standards of content, scope, and quality which must be met in order to qualify schools in such category to participate in the student loan programs under Title II, and (ii) determine whether particular schools not meeting the requirements of clause (5) [accreditation by voluntary associations] meet those standards. For purposes of this subsection the Commissioner shall publish a list of nationally recognized accrediting agencies or associations which he determines to be reliable authority as to the quality of training offered.

The Higher Education Facilities Act of 1963 repeated these provisions, explaining in greater detail the "advisory committee" role in the event no appropriate accrediting agency existed for institutions offering specialized 2-year programs. However, in 1965 one change occurred when the facilities branch of the Office reinterpreted the "three letter" clause to mean that three accredited institutions *have, in fact, accepted transfer credits* from an unaccredited college.

In the 1965 amendments to the Nurse Training Act of 1964 the Congress went a step further, and stated that an accredited program of nurse education "means a program accredited by a recognized body or bodies approved for such purposes by the Commissioner of Education, or a program accredited for the purpose of this Act by the Commissioner of Education" (Section 843 (f)). In the committee report accompanying the amendments, Senator Hill noted:

> It is not the intention of the committee to encourage Federal accreditation of nursing schools on a massive scale. But it is recognized that some excellent programs may not now participate under the Nurse Training Act because they are not accredited.

With the encouragement of the Senate committee, Undersecretary of HEW Wilbur Cohen met with interested parties from the profession and from voluntary agencies on October 19, 1965, to discuss appropriate means of dealing with applications from junior colleges that offered Associate Degree in Nursing Programs. As a result of this meeting, and subsequent deliberations, HEW ruled in February 1966 that the National League for Nursing (NLN) would be the recognized accrediting agency, but that if the Commissioner "should find the NLN unable to handle the necessary volume of applicants, or discover other unacceptable disadvantages of designating NLN as the sole channel for program accreditation under the Act, he would then consider the possible need to designate additional agencies or to resort to his new authority to accredit programs directly." During an interim trial period, NLN would be recognized, but appeals from institutions would be handled by a Special Review Committee composed of five senior HEW officials (including the Undersecretary, the Surgeon General, and the Commissioner of Education). Subsequently, the act was amended to provide for either institutional or specialized accreditation in the nursing field as the basis for determining eligibility for federal funding.

To summarize the period from 1952 to 1968, there were three major developments. First, in 1952 the Commissioner of Education was ordered by Congress to approve accrediting agencies. Second, in 1958 the "three letter" route was firmly established (it had been applied under the College Housing Authority since 1950) and the Commissioner was empowered to undertake quasi-accreditation through advisory committees where no recognized agency existed. Third, in 1965 the Commissioner was given the power to accredit programs himself (2-year nursing education) if he found no appropriate agency. Again, subsequent developments have brought about the use of state approved agencies for fields in which the manpower needs seemed to dictate the approval of more than just the accredited institutions or programs.

Expanding Coverage

Although the initial focus was on colleges and universities and their programs of study, the process of accreditation has also been instituted for other types of institutions on a national basis. Efforts at accrediting business schools were instituted as early as

1912, but it took until 1952 to merge a number of accrediting operations in the nationally recognized and accepted Accrediting Commission for Business Schools (ACBS) (48, p. 153). ACBS accredits independent nonprofit and proprietary schools and colleges of business. Private home study and correspondence schools now have access to a recognized accrediting agency, the National Home Study Council (43, p. 208).

Private nonprofit and proprietary trade and technical schools are also eligible for accreditation by the National Association of Trade and Technical Schools (6, p. 56). The regional associations have recently established procedures to accredit public vocational and technical schools and institutes. Accreditation is also available for such educational efforts as medical laboratory schools, Bible colleges, schools of cosmetology, and nurse anethesia, hospital programs in nursing, mortuary science, and clinical pastoral education programs. The most rapidly expanding area of accreditation is in educational programs for the allied health occupations, approximately 80 percent of which are located in hospitals and laboratories (47, p. H-4).

Summary

Nongovernmental accreditation has survived more than a half century of problems and controversy, growing stronger and socially more important in the process. Government and society now rely on accrediting agencies as the principal evaluators of postsecondary educational institutions and their programs of study and for establishing, maintaining, and raising educational standards.

Accreditation, while consolidating its importance and stature, has not found tranquility, however. Not only are the residues of past problems and controversies likely to linger, but the significance and new visibility of accreditation as important forces in society are combining to create new problems and issues as the following chapters will indicate.

3. Accreditation and Social Change

In a recent annual report of the executive director of the National Commission on Accrediting a focus is established for the current problems relating to the organization of accreditation:

> My reading and understanding of the forces at work in our society lead me to believe that colleges and universities and the professions should begin to share with other interests the responsibility for the accreditation process. The extent of this shared responsibility needs to be carefully studied and defined and an appropriate organizational structure formulated. At this point, it seems reasonable that a new organizational arrangement must recognize the new and increased uses of accreditation. It must provide for participation by such diverse interests as institutions, students, government, the professions, the public, and those who hold our institutions in trust. (16, p. 2)

Stemming from the civil rights movements of the 50s and 60s, a broader examination of power, privilege, and discriminatory practices has taken place, as a result of which social institutions are being asked to serve new functions and to question former positions. This searching examination has ranged broadly across society, touching the family, corporations, government, churches, and education to the extent that nearly every social institution in America is being reexamined to determine whether it meets current social needs.

Educational leaders such as Goheen have called the movement the "spirit of discontent" that seeks "expression and action" (28). This spirit is touching even the corporate giants of America. Dahl, who is Sterling Professor of Political Science at Yale University, has called for "interest-group" management of big business. He

suggests involving in the governance of corporations the respresentatives of various interests affected by the corporate activities (14). Social action groups have made their presence felt at stockholder's meetings. Such thinking and activity has caused BankAmerica Corporation to declare:

> Any company, and certainly any bank, must include in its own balance sheet some recognition of the state of health of the community it serves. The corporation, by virtue of its own enlightened self-interest, the consciences of its officers and the expectations of the public, has a role to play in the process of solving contemporary ills. (3)

The spirit of discontent has had other ramifications: it has shaped new social roles for churches (21); consumer takeover of major decisionmaking in the health fields is being seriously advocated and considered (13); and the American Assembly has stated that the health professions alone cannot sufficiently guard the consumer interest in health affairs (1, p. 9).

Social change as a way of life in a similar fashion has affected colleges and universities. Boulding notes "there is a feeling of the turn of the tide, a sense that a period is coming to an end and that the future may look increasingly different from the past" (7, p. 4). Colleges and universities have been asked to help solve problems created by the urban crisis, to provide educational opportunity for all, and to salvage all possible talent while providing individualized instruction and personal guidance (31). With colleges and universities becoming committed to the solution of social problems, it was inevitable that the agencies and associations that impinge upon their administration would also be affected by the social temper, particularly in terms of accrediting.

Selden, who views accrediting as one of the important elements of the governance of higher education (83, pp. 21-29), pointed this out in 1960 (81, pp. 91-92) and has subsequently frequently spoken and written about the social forces that will prompt accrediting modification (83, pp. 30-32).

As early as 1958, accreditation leaders began to sense that substantial change in the evaluation and approval of institutions and their programs of study was in the offing. Nyquist foresaw the development of a national system of institutional accreditation and suggested that new patterns of Federal and state support would exert new pressures on accreditation (12). Four years later, in 1962, he urged that members of allied professions and

occupations, as well as lay people, become involved in improving accreditation (61).

Criticism of the organization of accreditation intensified in 1966 when an advisory committee studying the role and functions of the National Commission on Accrediting urged the "commitment to the protection of the public interest as the primary consideration in accreditation" (75, p. 4). Cartter, recognizing the changing role of accrediting to society, urged consideration of the appropriateness of adding public members to the policymaking boards of accrediting agencies (11, p. 70).

Selden, based on speeches he gave in 1967, has written that the governance of higher education can no longer:

> . . .be allowed to rest only with the association of colleges and universities, which are engrossed almost exclusively in the operations of their own type of institution, or with organizations of individuals who concentrate their attention on advancement of their own professional or scholarly fields of study. (86)

Accreditation, as a significant element of governance, is a quasi-civil government function which, "if not so . . . performed, would need to be conducted directly by agencies of government" (86, p. 113). Selden called for inclusion of individuals from other fields of study, educational interests, and the general public in the membership of bodies conducting specialized accreditation. He suggested that public members be included on regional accrediting agencies and urged the National Commission on Accrediting to recognize that "its own organizational structure and center of political control should be altered for reasons similar to those that apply to accrediting agencies" (86, p. 114).

Elliott, president of The George Washington University and currently president of the National Commission on Accrediting, summarized his beliefs about the current status of nongovernmental voluntary accreditation, stating the ". . .machinery of accreditation has outlived its usefulness, [and is] helpless in the face of today's problems" (19, p. 1).

In a recent annual report of the National Commission on Accrediting it is recommended that two changes must take place if nongovernmental accreditation is to be preserved: (1) all institutions of higher education must evince a stronger interest in the accrediting process and must give more tangible support to the total enterprise, and (2) accrediting organizations must clearly display a greater concern for the public responsibility they hold (18, p 2).

Proffitt notes that in "our complex society of tomorrow it no doubt will be a verity that education will be too important to leave to the singular devices of the educators. . .and the professions, generally, too important to leave to the professionals. The professions need to be ventilated. . .by the regular voice of the public interest" (69, p. 3). He urged inclusion of public representatives on accrediting bodies, licensure boards, and the governing bodies of the professional associations.

Koerner has produced scathing criticism of accreditation and directs most of his attention to regional associations that, he says, "have become nothing but old-fashioned trade associations piously pretending to represent the public interest" (39, p. 4). Koerner admits that his comparison is inexact but, in so doing, he makes his point even stronger. He argues that trade associations are voluntary; but membership in a regional association for a college or university is "not a live option for a college that wants to survive" (39, p. 4).

> If anyone doubted the importance of accreditation, Parsons' [College] experience upon the loss of its accreditation ought to eliminate that doubt. Parsons immediately lost over half of its students. . .the decline continued. . .moving Parsons from a college of 5,000 students to one of 1,500 in the spring of 1969. Parsons' students lost government benefits. . . [and] easy transfer of credit to other institutions and graduate schools. The quality of the student body declined. . . .The ability of Parsons' recruiters to gain admittance to high schools also declined. . . .(40, p. 220)

Koerner takes the position that colleges and universities that associate to accredit one another constitute a "fundamental conflict of interest" (41, p. 52).

Robb and Nyquist agree that institutional accreditation is beset with problems, but suggest that significant change is underway, and refute Koerner's contention that regional associations are controlled by narrow interests (74, 61). Robb stresses the contributions of these associations in upgrading educational standards across the country.

Proffitt has said that the deference shown accreditation by Congress and the Federal Government requires accreditation to assume the burdensome responsibility of public trust: " . . . if the federal government is going to be justified in continuing strong reliance upon private accreditation, the. . .associations will need to more explicitly recognize their obligation to protect the public interest" (70).

Glenny has declared that a new leadership is emerging in higher education, "anonymous in personality and awesome in power." He asserts that accrediting agencies are part of this leadership.

> . . .there are now over forty professional associations, consisting of practitioners in the field and the professors in the universities who train the practioners, which. . .assert rights to accredit programs within the institution. Universities have little or no control over such associations, which, dominated in numbers by the professionals in the field, seem to act as a self-interest group for the professional school or department (27, p. 5).

According to Glenny, a few state institutional systems have seriously considered establishing a single state agency, thus freeing their institutions from all other accrediting bodies. He further declares that certain federal agency heads are recommending that a federal accrediting commission be established to achieve the same end (27, p. 6).

Several studies of accreditation consider whether the organization of accreditation is relevant to its current uses in American society.

Seidman concluded:

> Accreditation systems are structured in such a way as to subordinate the welfare of the educational institution as an entity and of the general public to the interests of groups representing limited institutional or professional concerns. Nobody concerned with accreditation, including the National Commission on Accrediting, is wholly free of the taint of partisanship. (79, p. F-3)

Ward found that persons "without a vested interest or persons or representatives of the public interest were not found in the power structure of any of the regional associations" and that "membership on boards of trustees of the associations and on higher commissions accrediting postsecondary occupational education was found to be overwhelmingly dominated by senior colleges and university presidents, vice-presidents, and deans" (92, pp. 196-197). Ward also found few representatives of the public interest and "never a majority" on the policymaking boards of specialized accrediting agencies (92, p. 199).

Messersmith and Medsker (45, p. 63) cite "misunderstanding and mistrust in the realm of specialized accreditation," springing from a feeling that external forces are seeking to displace the

prerogatives of institutions. Yet they also found that professional groups feel the need to protect their established admissions and training standards from a variety of pressures, among them low quality educational programs (45, p. 67).

Analyses by the Study of Accreditation of Selected Health Educational Programs show that only through the circuitous route of professional responsibility does the organization of accreditation in the health fields give more than token responsibility to its public trust function. What is done in the name of professional responsibility is not always accepted as being in accord with the public interest, even by members of the profession (46, p. B-30).

A study of institutional accreditation as conducted by the regional associations, known as the Puffer Report, has recommended a national posture for institutional accreditation to include common standards, procedures, and practices. The report recommends a national organization to oversee regional accreditation that would include public representatives on its board (20, pp. 10-11).

Within the last year the Federation has restructured itself and has adopted many of the recommendations set forth in the Puffer Report, thus making it an organization that coordinates institutional accreditation in a more effective manner. Public members have been added to the governing body of the Federation and steps are being taken to guarantee consistency among the various regional accrediting organizations to give assurance that the public interests are being served.

4. Social Values and Uses of Accreditation

It is generally recognized that accreditation serves an important function for society. The Preamble of the Bylaws of the National Commission of Accrediting incorporates this idea:

> . . . accrediting agencies have often been instruments for the maintenance of high educational standards; they have protected society against inadequately prepared professional and technical practitioners; they have aided licensing authorities and facilitated the transfer of students; they have been helpful to students and parents seeking to identify sound institutions; they have aided institutions in withstanding improper political or other non-educational pressures; and they have stimulated broad consideration of educational problems and issues of more than local concern. (53, p. 2)

Others have taken a more critical view of accrediting. Henry M. Wriston, a former president of the North Central Association of Colleges and Secondary Schools, spoke of the futility of the accrediting process:

> . . . [it] inevitably is driven to judgments which are essentially superficial, transient in their validity, and a drain upon time, energy, and resources that ought to be put into the real obligations of the college or university. . . . Accreditation seeks not only to compare apples with grapes, but both with camels and cods. (94)

Some commentators, among them the founders of the National Commission on Accrediting, similarly found little value

in accreditation and hoped that it could be eliminated entirely. In spite of such criticism:

> . . . others saw voluntary regional and professional accreditation as an expression of the American system of pluralistic governance; a potential, if imperfect, means of voluntary self-governance and self-control that colleges and universities must employ in the public interest unless they abdicate responsibility for their own regulation entirely to civil government. (54, p. 2)

A recent annual report submitted by an accreditation executive officer states that accreditation is essential to protect society from mediocrity in the educational process, to prevent students from being hoodwinked, and to keep the professions from being downgraded by the entry of ill-prepared practitioners. Furthermore, he said, a profession has a responsibility to assure society that its present and future membership will be adequately educated and prepared to assume those responsibilities that society expects of the profession (17).

A study of institutional accreditation showed that more than 1,000 college presidents were almost unanimous in their opinion that institutional accreditation is desirable, is generally performed reasonably well, and should be continued (20, p. 2). This compares favorably with the results of "A Study of Attitudes Toward Accrediting Among Institutions of Higher Education" conducted in 1966 by the National Commission on Accrediting. Ninety-one percent of the institutions in the sample favored the continuation of both institutional and specialized accreditation (57).

Messersmith and Medsker have stated that voluntary accreditation, despite its imperfections, in its present form is "an outstanding example of the willingness and ability of institutions and professions to police themselves and implement standards. Even critics of the process are aware that it has met an important social need" (45, p. 67). Selden (84, p. G-2) comments that the question is no longer, Should accreditation take place? but In what form, by whom, and who should finance the process? A cursory examination of the uses of accreditation appears to support his contention that accreditation is an essential social function.

Uses of Accreditation

No single list of all the uses made of nongovernmental accreditation is available; the uses are so vast and varied it would be

virtually impossible to compile an all-inclusive and accurate listing. The accreditation process serves simultaneously the more narrow and limited objectives of private agencies and associations as well as a broader, public function.

Public Uses.—Accreditation's broad impact upon society and educational institutions can be demonstrated by citing several uses made of accredited status. Accreditation is a primary consideration for parents, prospective students, and counselors in choosing educational institutions and programs of study. Several national publications and directories attest to the importance of information on the accredited status of institutions. *Accredited Institutions of Higher Education* lists colleges and universities accredited by or holding candidate or correspondent status with the six regional associations of colleges and schools as well as programs of study within institutions that hold specialized accreditation (published annually by the American Council on Education, Washington, D. C.). *Accredited Higher Institutions*, which was published quadrennially by the U.S. Department of Health, Education, and Welfare, Office of Education, listed only accreditation status granted by nongovernmental accrediting agencies. The Office of Education has now replaced this publication with *Accredited Postsecondary Institutions and Programs*, which it plans to publish annually. Like its predecessor, this publication lists accredited status as awarded by nongovernmental agencies only with the single exception of the New York Board of Regents. *American Universities and Colleges* lists only accredited institutions or components of institutions accredited by regional or professional associations (published quadrennially by the American Council on Education, Washington, D. C.). *American Junior Colleges*, beginning with the eighth edition, lists only institutions holding accredited or recognized candidate status with a regional association (26, p. ix). *Guide to American Graduate Schools* (42, p. xxix) lists only accredited institutions. *The College Blue Book 1969/70* (78, pp. 207-295) lists the accredited status of institutions and programs of study and has an 83-page section on accreditation. All these directories are widely used by counselors, prospective students, and their parents, as well as by educational institutions to determine the status of other institutions and their programs of study.

Use of accreditation by state licensure authorities make graduation from an accredited program highly important and often essential for individuals. State boards that license or admit to

practice architects, dentists, engineers, lawyers, physicians, optometrists, pharmacists, podiatrists, and veterinarians, make extensive use of accredited status granted by nongovernmental accrediting agencies (65, 30).

Admission to graduate schools is most often dependent upon graduation from a regionally accredited college or university (29, p. 7). State laws, other than those relating to licensure, occasionally make use of nongovernmental accreditation. For example, institutions eligible to participate in the Texas Hinson-Hazlewood College Student Loan Program must be "accredited by a nationally recognized accrediting agency or association listed by the National Commission on Accrediting" (77).

The Accreditation and Institutional Eligibility Staff of the Office of Education lists 21 government agencies that make use of nongovernmental accreditation (91). This list may not be all-inclusive, but it is growing. The Vocational Rehabilitation Administration (VRA), which provides extensive traineeship and fellowship support, recently notified institutions that only educational programs now accredited or in the process of being accredited in speech pathology or audiology will be eligible for traineeship grant support. The VRA has further stipulated that all programs receiving traineeship support must be accredited by April 1, 1974 (2, p. 13).

To institutions perhaps the most important use of accreditation made by the Federal Government is its use as the primary means of establishing eligibility for federal funds. Five billion dollars in federal monies were expended on the basis of accredited status in fiscal year 1972 (68). Furthermore, accreditation status also is frequently a requirement to receive grants from private foundations (56).

One of the newer challenges for accrediting organizations will be that of finding ways to assess the quality of the large number of nontraditional programs being developed by higher education institutions. Some of these programs will be in the more traditional institutions, but others will be promoted by profitmaking organizations. The point of view has been expressed on many fronts that the public must have some valid means to compare the quality of the programs offered through proprietary channels to those offered by the nonprofit institutions. The fact that several accrediting organizations have already established new standards for accrediting nontraditional programs has caused the commission on Non-Traditional Study, financed by the Carnegie Corporation,

to make a tentative recommendation that no new accrediting organizations be established for nontraditional study. Rather, they would hope that the associations already in existence would develop new standards and procedures to enable them to sanction certain nontraditional programs.

There are other public uses of accreditation. Among them is preference in employment opportunities both with government and the private sector. (Studies demonstrating the extent of such preferential treatment are not available.)

Other Uses.—Other uses of accreditation, although less public in nature, have a far-ranging impact on individuals. The American Chemical Society conducts accreditation primarily to assist "in identifying bachelor's degree graduates who qualify for member status in the Society with a minimum length of time" (51, p. 1). Accreditation also determines the eligibility of graduates in forestry for certain grades of membership in the Society of American Foresters (52, p. 1). Eligibility to sit for registry examinations for numerous health fields and/or to qualify for membership in professional societies is often tied to graduation from an accredited program (30, tables beginning on I-30). Often membership in associations of educational institutions also is limited to accredited status.

Other uses or functions of accreditation are variously stated in the literature. As listed by the U.S. Office of Education (89, p. 1), they include:

- Protecting an institution against harmful internal and external pressures.
- Creating goals for self-improvement of weaker programs and stimulating a general raising of standards among educational institutions.
- Involving the faculty and staff comprehensively in institutional evaluation and planning.

It is this broad influence and impact of accreditation that has generated the controversy regarding its organization and role in society.

Functions or Purposes of Accrediting

Accrediting agencies can only be conscious of the various uses of the accreditation status they grant. They can cooperate and attempt to serve but they by no means can control the use of their accredited lists. They have to think in terms of functions or purposes of accrediting while at the same time being fully aware as socially important organizations of the implications of their activities.

A recent study of accreditation attempted to distinguish between the uses of accreditation and the functions or purposes of accrediting (unpublished dissertation by Jerry W. Miller, "Organization Structure of Nongovernmental Postsecondary Accreditation: Relationship to Uses of Accreditation," The Catholic University of America, Washington, D. C., 1972). The author noted that nongovernmental accreditation should and does serve a variety of functions in society, some of which are more essential than others. Some functions are sufficiently important to warrant conducting accreditation solely for those purposes. Others are highly important to society and the smooth functioning of educational institutions. Still others are desirable by-products of accreditation that should be encouraged.

In a dynamic society, the relative importance of the functions of accreditation undergoes steady change, with new functions being added and others shifting in their hierarchical relationships to meet new social and educational uses and needs. As part of the study referred to above, the Delphi technique was used to collect data about 100 individuals' views of the functions accreditation should serve in American society. The emphasis on these functions will vary among the types of accrediting agencies and the institutions and programs of study they serve. Generally, at this period of time, it was the opinion of the Delphi participants that nongovernmental accreditation should attempt to serve effectively the following functions:

Primary

To identify for public purposes educational institutions and programs of study which meet established standards of educational quality.

To stimulate improvement in educational standards and in educational institutions and programs of study by involving faculty and staff in required self-evaluation, research, and planning.

Secondary

To assist in the development of processes and instruments to evaluate institutions and programs of study and their educational achievements.

To provide assurances regarding curricula, policies, practices, and requirements which enhance acceptance and cooperation and facilitate transfer of credit among a variety of types and levels of institutions.

To provide reasonable assurance that practitioners whose activities have a direct bearing on the public health and safety or whose activities could cause irreparable harm to society meet minimum educational standards upon entry into the profession.

To identify for public purposes educational institutions and programs of study which adhere to accepted ethical standards in business relationships with students.

To protect institutions and programs of study against external and internal interference by groups and individuals who seek to control, distort, or divert the educational function to serve partisan interests or purposes.

To identify for public purposes educational institutions and programs of study which are making efficient use of their resources in meeting their stated goals and objectives.

Desirable By-Products

To serve as a medium of communication for educational practices and ideas among institutions, individuals, and programs of study through widespread participation in the accreditation process.

To assist institutions and programs of study in obtaining resources needed to offer quality education by providing independent professional judgments.

To provide on a comparative basis information to the public about accredited institutions and programs of study.

Accreditation and Accountability

When the call for accountability in education first became pronounced during the late 60's, some expected accreditation to be called upon to carry a large share of the load. It was generally

presumed that accreditation had been providing a measure of accountability for several years. Accrediting agencies have said a great deal about the quality of educational opportunity and it has been generally assumed by educators and the public that quality educational opportunities most often result in quality educational products (58, p. 1).

Accreditation has not rated a great deal of attention in the call for accountability, however. Mortimer hints at the explanation. He comments that "evaluation is concerned primarily with educational effectiveness, whereas accountability is concerned with effectiveness and efficiency" (50, p. 6). Effectiveness, Mortimer says, is the degree to which the organization succeeds in whatever it is trying to do; efficiency is an organization's capacity to achieve results with a given expenditure of resources. Accreditation, by and large, has not given a great deal of attention to efficiency.

In Mortimer's review of the literature on accountability in higher education he makes only a fleeting reference to accreditation, viewing it as the means whereby professions hold institutions accountable for the quality of graduates of professional programs (50, p. 12). And in projecting the dimensions and means of accountability in the next decade, he makes no direct reference to accreditation.

Romine, however, emphasizes that accreditation has a role in accountability. The emergence of the concept of accountability:

> . . . implies that the warranty of accreditation is subject to question. If accreditation as conducted by the regional associations is to retain its significance, it must be responsible to this accountability. (76)

He concludes that accreditation is obligated to do its part to restore mutual trust between institutions of higher education and the public by providing accountability (76).

The literature relating accreditation to accountability is sparse; what does exist is suggestive that accreditation may be called upon to play a larger role in the future. If that is the case, the components represented in the organization of accreditation will become increasingly important.

5. The Professions and Accreditation

In discussing the role of professions in society, Barber suggests that:

> . . . generalized and systematic knowledge provides powerful control over nature and society . . . the requisite understanding [of such knowledge] is available in full measure only to those who have themselves been trained in and apply that knowledge. It follows that some kind of self-control, by means of internalized codes of ethics and voluntary ingroups, is necessary. (4, p. 19)

This means of self-control has resulted in the formation of hundreds of "professional" associations or organizations in America, many of which seek to achieve what Becker has identified as some of the major symbols of a profession: (1) recruitment must be strictly controlled; (2) entrance must be strictly in the hands of the profession; (3) approval and accreditation must be done by members of the profession; and (4) since recruitment, training, and entrance into the practice are carefully controlled, any member of the professional group can be thought of as fully competent to supply the professional service (5, p. 33).

Hughes states that professions tend to follow a set of themes in their "professionalizing" movements directed at changing their status in relation to clients, the public, and other occupations. The changes sought are:

> . . . more independence, more recognition, a higher place, a cleaner distinction between those in the profession and those outside, and a larger measure of autonomy in choosing colleagues and successors. (34, p. 7)

As one means of expressing their autonomy, the professions have sought to regulate entry into the profession through control of education. Such control is justified on the basis that the profession is the holder and the guardian of an esoteric, specialized body of knowledge; thus, only members of the profession are qualified to make judgments regarding educational programs that prepare future members of the profession. Once a profession can substantiate such a claim, it can then use accreditation of educational programs as the principal basis for "choosing colleagues and successors."

Unquestionably, the activities of professional associations in setting and maintaining educational standards through accreditation have benefited society (23, p. 30; 49, p. 111). But such activities have not been unchallenged. In Moore's opinion:

> Self-regulation may serve to preserve and even enhance standards, but [it] may also be used merely to enhance occupational prestige, to control the number of authenticated practitioners in order to reduce competition and increase income, and not uncommonly, to protect a particular orthodoxy against reasonable and even superior alternatives. (49, p. 111)

Moore opposes the idea that only the professions are in a position to determine their own educational requirements for entry into their profession. He asserts that none of the older "established professions" has been able to command a complete monopoly on its claimed field of competence (49, p. 111).

Price has stated:

> . . . the more an institution or function is concerned with truth, the more it deserves freedom from political control. . . . the more an institution or function is concerned with the exercise of power, the more it should be controlled by the processes of responsibility to elected authorities and ultimately to the electorate. (64, p. 191)

Charges that the professions are using accreditation as an exercise in quasi-governmental power has generated a substantial volume of literature challenging the autonomy of the professions in exercising this function. Increasingly, accreditation as conducted by professional associations is being viewed in a negative relationship to the public interest by scores of scholars and writers.

In addition to works previously cited, other influential works have included those by Friedson (22), Gilb (24), Ginzberg (25), and Rayack (71). They all question the privileges society has tacitly granted to the professions in exercising exclusive control over their own destinies.

The criticism of scholars, government officials, and even members of the professions suggests change in the role of professional groups in society. The implication for accreditation is that the professions will be called upon to share the responsibility for accrediting educational programs to prepare their future members.

6. The Courts and Accreditation

Kaplin has noted that the courts and the legislatures are, after all, the ultimate formulators of public policy (36, p. J-1). What the courts say about accreditation is sure to influence, if not determine, many of the activities and policies of accrediting agencies. For the focus of this monograph, it is important to consider what the courts and legal scholars have said about accreditation as it relates to the public interest and society.

Kaplin and Hunter, in studying the legal status of accrediting agencies, wrote in 1966 that these instrumentalities in the U.S. are "able, with minimal governmental interference, to set policies and standards in an area of vital concern to the public" (38). Accreditation litigation since that time stresses the validity of their statement. Two important cases have been decided by the courts, with strong implications for the organization of accreditation.

In the first of these, *Parsons College v. North Central Association,* the court chose mainly to determine whether North Central had followed its own stated rules and procedures in deciding the accreditation issue. The court deferred to the expertise of North Central with regard to the validity of its accrediting standards as well as the accreditation decision. Parsons attacked the standards as nebulous and vague and "unintelligible to men of ordinary intelligence." The court took another view, however, holding that:

> . . . the standards of accreditation are not guides for the layman but for professionals in the field of education . . . . The public benefits of accreditation, dispensing information and exposing misrepresentation, would not be enhanced by judicial intrusion. Evaluation by the peers of the college, enabled by experience to make comparative judgments, will best serve the paramount interest in the highest practicable standards in higher education . . . . (8, pp. 109-110)

The court's decision has been interpreted by some as justifying the exclusion of public or lay members from service on bodies making decisions about whether to accredit or re-accredit institutions or programs of study. Such decisions, they argue, would be more readily challengeable in the courts if public or lay persons were taking part. These same individuals argue, however, that public or lay persons could serve on national bodies that establish overall policy for accreditation (20, p. 11).

In *Marjorie Webster Junior College v. Middle States Association of Colleges and Secondary Schools*, the district court was not hesitant to take a position regarding the standards of accrediting agencies—although the decision was later reversed by the appellate court. It ruled that Middle States' refusal to consider Majorie Webster Junior College for consideration on the basis of the Middle States nonprofit criterion was "arbitrary, discriminatory and unreasonable" (44, 302 F. Supp. 459, 468).

In analyzing the significance of the case, Kaplin stated that:

> . . . the history of the case suggests that the standards by which higher education is governed may come under increasing scrutiny by the courts, as well as by the higher educational community itself. The extensive litigation and the public debate it fostered have brought some of the searching questions of governance to the fore. While their solution is a matter initially and primarily for the accrediting agencies themselves . . . the courts can nevertheless play an important role when alleged solutions, or their lack, subject institutions or the public to arbitrary and unreasonable exercise of accrediting power . . . . For the first time accrediting agencies have been termed (although the appellate court 'assume[d] without deciding') quasi-governmental organization, limited by the Constitution (37).

Kaplin's analysis of the Appellate Court decision on Marjorie Webster led him to state that in "other cases, with different factual records or different accrediting judgments at issue, or simply with less 'deferential' courts, the same legal principles could be used to reach different conclusions" (37). He stressed the validity of the District Court's exhortation to accrediting agencies. That exhortation, delivered by Judge John Lewis Smith, Jr., declared that accreditation has been established in the public mind as a mark of distinction and quality; in view of this great reliance placed upon accreditation by the public and the government, Judge Smith asserted that these associations must orient their policies toward the broader welfare of society and the public interest (44, 302 F. Supp. 470).

The *Harvard Law Review* took issue with the appellate court reversal, stating that:

> . . . a decision requiring Middle States to evaluate Marjorie Webster would have encouraged the development of standards that measured a college's performance, rather than those which simply preserve the status quo in educational institutions. The development and enforcement of these standards could open the way for a flow of new money and ideas into higher education, while at the same time preserving a desired quality control (32).

Whatever the legal merits of the district and appellate court decision on Marjorie Webster, the lower court decision, although overturned, has exerted and will continue to exert a strong influence on the future course of accreditation because it so forcefully and logically sets forth the public trust responsibilities of accrediting agencies. Its influence also was enhanced because it coincided with a growing recognition and concern about the broad impact on society of private agencies and associations.

Kaplin, in a recent analysis of the courts' view of the public impact of the professional association, notes that a potential conflict of interest inheres when professional associations represent not only the broad interests of society but also the narrow interests of their members (36, J-8). Clearly, setting and enforcing educational standards is one area in which the activities of professional associations have an impact on society. Thus, Kaplin states:

> When the professional association is actually relying upon its expertise, it is genuinely fulfilling its standard-setting role and is likely to be operating in the public interest. When considerations other than expertise influence professional action, the association may be acting primarily as a professional 'union' for its members, and it is less clear that societal interests are being served (36, J-8).

Drawing on a body of "private association law," Kaplin suggests that the courts are not likely to intervene in the affairs of associations when they can be reasonably assured that the concepts of professional autonomy and expertise are not being abused. They can be expected to step in, however, when there is an "overriding public interest" that transcends the particular interest of the association (36, J-12). He comments that the expertise of social and applied sciences may be needed to solve some

problems along with the "moderating influence of lay opinion." He cited the Marjorie Webster litigation as indicative of public concern that issues of accreditation are indeed leading to increasing judicial concern (36, J-12).

What Kaplin concludes regarding the public scrutiny of the activities of the health professions is probably equally applicable to all accrediting associations and agencies:

> Such scrutiny does not presage an end to professional autonomy nor an undermining of professional expertise; it only suggests that the deference which is accorded autonomy and expertise will be weighed in the future against a broader backdrop of public interest factors (36, J-29).

In sum, the courts have set some guidelines, if not sounded some warnings, to which accrediting agencies will be required to adhere in the future.

7. Federal Involvement

Recent reports of federal agencies indicate a growing interest in nongovernmental accreditation by the Federal Government. Generally, they raise the specter of greater federal involvement in accreditation.

The *Report on Higher Education* (known as the Newman Report) states:

> In the name of protecting the standards of education, regional and specialized accrediting organizations pressure new institutions to develop faculties, buildings, and educational requirements on the pattern of established conventional colleges and universities. Moreover, these organizations—dominated by the guilds of each discipline—determine the eligibility of these new institutions for public support. We believe (1) the composition of established accrediting organizations should be changed to include representatives of the public interest; and (2) Federal and State governments should reduce their reliance on these established organizations for determining eligibility for Federal support. (59, p. 66)

Subsequently, the Newman Task Force has circulated widely a November 24, 1971 draft of "Accreditation and Institutional Eligibility." The recommendations in the draft called for the separation of institutional eligibility and accreditation and for new Federal authority to deal with the restrictive practices of nonprofit groups. Particularly singled out were specialized accrediting agencies. (Photocopy draft furnished the authors by Newman Task Force Staff Members, December 1971. The reception afforded the draft probably will result in extensive revision).

A report issued in mid-1971 more directly sets forth the federal interest and "responsibility" in accreditation:

> Only a few years ago, issues such as licensing, certification and accreditation were generally thought to be the concern of only the professional individuals and organizations that were affected by them. The public-policy aspects of these issues were not often perceived by decision-makers, long accustomed to the guild traditions that have characterized attitudes in this area. Today, these matters are not immune from public criticism; and the responsibility of both public and private leadership is to fuse health-manpower credentialing with the public interest. (90)

The report declares that accrediting agencies are functioning in a quasi-governmental role, and that their activities relate closely to the public interest because significant amounts of public funds are tied to the status they grant (90, p. 14). The report mandated that the Commissioner of Education undertake a formal review of accreditation with specific attention given to the possibility of "establishing a Congressionally-chartered public corporation to promote the national coordination of accreditation" (90, p. 72). The report further stipulated that the Assistant Secretary of Health and Scientific Affairs would undertake a determination of the feasibility of national health professions certification (90, p. 73). This suggestion has relevance for accreditation because certification and registration have heretofore been a function of private voluntary groups, similar to accrediting agencies and associations. The possibility of a new national organization, implied in the required study, could preempt existing organizations or set up a competing organization.

(Seidman, formerly assistant director of the U.S. Bureau of Budget for Management and Organization and an authority on federally created corporations, has discounted the possibility of a Congressionally-chartered public corporation to oversee accreditation. He does not believe Congress would intervene because the proposed delegation of powers could not be "reconciled with the principle that accreditation should be conducted by nongovernmentally controlled agencies or organizations." Such considerations, he said, are premature. The first step could be the reform and reorganization of the National Commission on Accrediting and the regional associations (80)).

Another Federal report, in discussing the roles of professional associations in accreditation, states:

> . . . the organizations are, and must be, directly and actively concerned with the economic, political, and social welfare of their

> members—a fact which has a direct bearing on their organizational structure, operations and other related factors. (62, p. 1)

The report further declares that accreditation in postsecondary education is a disjointed and fragmented effort that produces many problems for the Federal Government in its efforts to administer funding assistance programs for education (62, p. 12). It urges professional associations to study and justify their practices for the benefit of the consumer and the larger public interest (62, p. 13).

Recent sensitivity to governmental involvement in accreditation is demonstrated by the content of a letter dated July 3, 1968, to the Honorable Harold Howe, II, then U.S. Commissioner of Education, who was at that time in the process of establishing the "Accreditation and Institutional Eligibility Staff" in the Office of Education. The letter, signed by the 13 chief executive officers comprising the Secretariat of the major higher education organizations in Washington, suggests that "accreditation" be eliminated from the title:

> We understand that 'accreditation' refers primarily to the process of 'recognizing' accrediting organizations, and under present circumstances there would seem to be no reason to believe that the Office of Education would use the breadth of the title to become engaged in actual accrediting activities. However, the presence of the word 'accreditation' in the titles for the staff unit might be misunderstood by both the academic community and those outside the educational institutions, and might conceivably present difficulties for the Office of Education in the future. (33)

The following chronology indicates a virtual geometric increase in the governmental interest in accreditation since 1968:

1968—Establishment of the Accreditation and Institutional Eligibility Staff (AIES) at the Office of Education to administer the Commissioner's recognition and review process for accrediting agencies.

1969—Publication of new criteria by which the Commissioner evaluates agencies for recognition or rerecognition through inclusion on the list.

1970—Administrative indication that the recognized list of the Commissioner should no longer be identified solely with establishing eligibility for federal funds, signaling a broader interest in accreditation by federal officials.

1971—Publication of the Newman report, with the approval of the Secretary of Health, Education, and Welfare, calling for revision in the roles of accrediting agencies and charging them with domination by the "guilds of each discipline" (59, p. 66).

1971—Transmittal of a report to Congress by the Secretary of HEW, mandating a study of accreditation by the Office of Education to:

> include an analysis of all alternatives that may have potential in maximizing the public accountability of those accrediting agencies that enjoy nationally recognized status conferred by the Commissioner. (90)

1971—Notification to the recognized agencies by the acting Commissioner that they should ensure that unacceptable discrimination or arbitrary exclusion is not practiced by accredited schools or programs.

1971—First recognition of an agency that has responsibility for the accreditation of educational programs at the secondary school level.

1971—Indications that the Newman task force will recommend: (1) tighter federal control of nongovernmental accrediting groups, if not abolition of specialized accreditation; (2) separation of the establishment of eligibility for federal funds from accredited status; and (3) new federal legislation to deal with the restrictive practices of nonprofit organizations which would give power to a federal agency to investigate and act upon violations involving specialized accrediting agencies (15).

These actions, particularly the Newman reports and the report of the HEW Secretary to Congress, imply extensive federal involvement in accreditation. The rationale for this involvement appears to be based on three theses: (1) accrediting agencies are engaged in processes that have a substantial bearing on the public interest; (2) there is evidence that these agencies do not give primary consideration to the public interest, but favor the interest of their members or member institutions; and (3) therefore, the Federal Government should become more involved to assure that accrediting groups operate in the public interest.

It is significant that, with the exception of the HEW Secretary's report to Congress on credentialing in the health fields, nearly all the increased federal activity concerning accreditation has been initiated by federal administrators, not by legislators in the halls of Congress. Furthermore, congressional authorization

for federal involvement with nongovernmental accreditation is limited to: (1) establishment of eligibility for the distribution of federal funds in several legislative acts for postsecondary education, and (2) maintenance of a recognized list of accrediting agencies by the Commissioner of Education solely to implement the provisions of the legislation. Additional federal involvement with nongovernmental accreditation appears to be based entirely on administrative decisions.

The major theme underlying increased federal activity in accreditation is that accrediting agencies themselves are unlikely to change or reform; therefore, it must be imposed upon them. Little credit is given to the accrediting community for the change currently under way and the broadening concern of accrediting agencies for the social responsibility of accreditation. The Newman group has dismissed current changes and accreditation studies as the "gentle reexamination" by concerned elements withing the educational and accrediting communities who seek to improve the system before accrediting problems boil into a public issue.

Implicit in the reports and activities of the Federal Government is the assumption that broader involvement by federal agencies will make accreditation more socially responsible, as well as provide answers to educational problems.

Accrediting agencies have gained from their relationships with both state and Federal governments. Federal utilization of accredited status has resulted in additional pressures for programs and institutions to be accredited; in some cases it has made accreditation virtually mandatory. Some accrediting agencies have been eager to or have sought to serve government agencies; others have done so willingly. Few have resisted and, as a result, the federal use of accreditation continues to grow. The AIES now lists 21 federal agencies that utilize accredited status granted by nongovernmental agencies.

Apparently, some accrediting agencies have applied for recognition by the Commissioner of Education solely to obtain the status that goes with inclusion on the list. Many agencies presently have no functional responsibility for establishing eligibility for federal assistance. Perhaps they are hopeful that future educational legislation will specify their accredited status for eligibility purposes and they will have the advantage of already being on the list. At any rate, their inclusion increases the significance of the Commissioner's list and results in an accretion of power in his office over accrediting agencies.

Effective and penetrating discussion among accreditation leaders and others has caused accrediting agencies to become more firmly committed to serving societal needs first and foremost. However, not enough discussion has focused on the increasing dependence of government upon accreditation and the increasing tendency of accrediting agencies to seek governmental recognition and to utilize the status it grants. Federal government and accrediting agency relationships have evolved with little thought to the long-term implication for accreditation. More critical, certainly, is the fact that little thought has been given to the resulting implications for postsecondary education in general.

Dilemma for Accreditation

The use of accreditation status by government is so extensive that there exists virtually no possibility of a complete pullback, even if such were desirable. Therein lies a major dilemma for accreditation.

If accrediting agencies continue to seek recognition by USOE or willfully serve governmental purposes and functions, they can expect increased governmental control and direction. On the other hand, public disavowal of any responsibility to serve government could be declared socially irresponsible for agencies that purport to serve the public interest. Yet, many believe accreditation can best serve society if it is totally free of domination or control by governmental interests. The basic problem is to determine the degree and kind of influence to be exercised by the government.

The implication that accreditation can best serve the public interest when it is free of governmental control is paradoxical to some. To others, it is a recognition of several logical assumptions:

1. Accreditation is a principal component of the governance of postsecondary education in the U.S.; those who control accreditation exert a strong measure of control over postsecondary education.

2. Postsecondary education inevitably must and should respond to long-term interests and needs of society as manifested in governmental programs and elsewhere. To serve society well, however, postsecondary education must be afforded a measure of stability; otherwise, it can be buffeted by state or federal administrations seeking to accomplish various objectives.

3. Nongovernmental accreditation is an extension of the balance-of-power concept on which the Federal Government and society are founded. To prevent the development of a monolithic postsecondary educational structure susceptible to control by narrow interests, accreditation should remain a diversified nongovernmental activity that can balance short-term governmental interests with long-term societal objectives.

4. Growing federal control over accreditation carries with it the potential for considerable control over educational practices and standards. This violates the traditional role of the Federal Government in education, if not its constitutional authority.

Some will argue that it would be irresponsible for the Federal Government to utilize the accreditation status granted by nongovernmental accrediting agencies without assessing their competence and activities in light of governmental objectives. However, the tendency would probably be for any form of review or recognition to grow more prescriptive if it were not legislatively defined.

If this were true, over a period of time the Federal Government could be expected to exert increasing control and influence over accreditation and, consequently, over postsecondary education. Developments since 1968 seem to validate this assumption.

The dilemma grows when one considers the alternative of the Federal Government substituting its own procedures for those of nongovernmental agencies. Such an alternative multiplies the potential for exerting direct control over institutions and their programs and creating a monolithic system of postsecondary education.

Not only is the current situation perplexing, but it also grows more complicated with every new federal use of accreditation. It is urgent that attempts be made to establish and clarify parameters for relationships between government and nongovernmental accrediting agencies.

In considering the issues, the following questions appear basic:

1. Will continuing on the present course result in the Federal Government in the future exercising an unacceptable degree of control and influence in the accreditation of postsecondary education?

2. If so, should accrediting agencies continue to accept responsibility for serving governmental purposes and objectives but under well-defined parameters to guide the relationships?

3. Or, should accrediting agencies disavow any responsibility for serving governmental purposes and functions and refuse to submit to review and recognition procedures by the Federal Government?

4. Or, could accrediting agencies adopt a policy of affirmative disclosure relative to the policies, procedures, and decisions, thereby requiring the Federal Government to take the initiative in determining the acceptability of accrediting activities for governmental purposes instead of placing the burden of proof on accrediting agencies?

8. The Future of Accreditation

In recent months, the executive committees of the Federation of Regional Accrediting Commissions of Higher Education and the National Commission on Accrediting have agreed to a merger of these two organizations. The new organization has tentatively been referred to as the National Council on Institutional and Specialized Accrediting.

The planned merger of the two organizations is a recognition of the growing social importance of nongovernmental voluntary accreditation. It will be directed toward improving the effectiveness of accreditation, providing closer coordination between institutional and specialized accreditation, and presenting a unified national voice for the process.

The new National Council on Institutional and Specialized Accrediting, with public representation as well as institutional and professional representation, will coordinate and govern the activities of the merged organizations and will include the accrediting agencies working with proprietary institutions as well as those in the non-profit domain.

Obviously, the restructuring of the administrative and coordinating pattern of accreditation is but one element to be considered in determining the future for this important element of education. Other internal changes are also needed.

To meet the social needs for improved higher education and the individual needs of the better colleges and universities for protection from the competition of unqualified, even dishonest, institutions, associations of the colleges and agencies of the professions initiated the process of accreditation. Ever since, these voluntary, nongovernmental, extra-legal organizations have grown in number and influence. As in the case of the regulatory commissions

of the Federal Government, the accrediting agencies have been subject to much criticism, some of it highly justified. The bases of these criticisms have encouraged some individuals to condemn all external regulations and to claim, as in the case of business, that the nineteenth century concept of the completely free market place should again prevail. Similarly, in the case of accreditation, there are claims uttered often enough to warrant rebuttal; namely, that higher education is now sufficiently mature no longer to require any external control and that accreditation should be abolished because, among other factors, it frequently inhibits the institutions from adequately meeting the demands of society.

William K. Selden, in an address to the meeting of the American Council on Education in 1964 said: "Whenever controls are established for the purpose of improving minimum standards, regrettably but inevitably there is some restriction on those who are fully capable of employing appropriate judgment and who would conduct excellent programs regardless of the demands of regulating agencies. Such restrictions can be minimal, but even if they are not, this fact does not imply that society would benefit if educational institutions were subject to no external supervisions and both the weak and the dishonest, as well as the excellent, institutions were permitted to operate unmonitored. The consumer in the market place in our complicated society cannot protect himself from those organized to perpetrate frauds or to distribute goods of shoddy quality."

Mr. Selden also stated that "there is Gresham's law of economics, dating from the sixteenth century, which states that coins of good value are driven out of circulation by coins having equal monetary value but less intrinsic value. A similar principle can be applied to education: *as a society places greater value on the attainment of academic degrees, the degrees from colleges and universities whose academic programs are superficial and shoddy will undermine the value of similar degrees from institutions whose educational offerings are excellent.*" A nation can no more afford to permit the operation of unqualified colleges and universities than it can permit the circulation of counterfeit money. As one of the two present leading powers in the world, the U.S. cannot afford to allow either its coinage or its academic degrees to be debased. And the U.S. public, which has heretofore relied primarily on higher education to enforce its own minimum standards, will soon begin to question this reliance if higher education does not improve its methods of self-governance.

It is in this context that the colleges and universities and other educational institutions to whom society has assigned the responsibility for their own self-governance, must fulfill their obligations among other steps by improving accreditation—the institutions' primary method of collective regulation.

The improvement of accreditation, and thus the fulfillment of these obligations, has been hindered by several major factors. *First*, with the exception of the desires of some professors for controls that will protect their respective fields of study, there is a widespread attitude in academic circles that most regulations of universities are barnacles to educational development. Professors who might strongly support the extension of governmental controls over business, the banks, or the securities exchanges have argued without hesitation that the establishment of regulations for colleges and universities is an intrusion into academic freedom.

Second, the presidents and other major officials of many of the most influential colleges and universities have shown in the past several decades decreasing interest, if not antipathy, to accreditation as an important function in the governance of higher education.

Third, because of the diversity and numbers of institutions of higher education, because of the great variation in their programs of study, because of the personal nature of education, because of the many purposes which it is intended to meet, and because of the present elementary stage of development of educational evaluation, there are wide differences of opinion with regard to the factors that should be judged in measuring the quality of an institution or a specific program of study. Lacking adequate indices and proven techniques of measurement, and occasionally lacking adequate concepts of educational effectiveness or excellence, accrediting agencies have been forced to rely more than is ideally desirable both on personal judgments which are fallible and on quantitative factors which do not always have a direct or proven correlation with excellence. As a result, accreditation has been subjected to harsh but sometimes justifiable criticisms on the one hand by institutions barely able to qualify for initial accreditation or reaccreditation, and on the other hand by colleges and universities of known excellence that no longer feel the threat of the shoddy or dishonest institutions and accordingly feel less individual need to support accreditation as a vital force in the self-governance of higher education.

Fourth, basic to all of the factors that have hindered accreditation from fulfilling its total potential has been the very human and understandable characteristic of educators to be more concerned with their own fields of study or their own institutions than with the total governance of higher education. As one professional agency conducts its program of accreditation, it is seemingly indifferent to the accreditation of other areas of study on the same campus. The lawyers have supported the concept that law schools should be integral parts of universities but have simultaneously appeared to act in their programs of accreditation on the concept that their schools should be operated as completely autonomous units of universities. The medical profession, in its insistence upon attainments that have helped to make it the envy of all other professions, has all too frequently overlooked the fact that its demands on the universities, which have provided great assistance to the improvement of medical education, have frequently been met at the expense of other equally important schools in the universities.

For their part the officials of many colleges and universities have tended to regard accreditation as little more than a nuisance that they were willing to countenance for the apparent benefits and protection it offers; and they have been reluctant to recognize that the operations of their own regional associations are more than locally or regionally important.

If higher education is to be permitted to continue to conduct its own self-governance, and if higher education is to continue to rely on accreditation as the primary means of conducting this self-governance, accreditation needs to be made a much more effective instrument than it is at present. Among the concerted efforts that must be made to accomplish this improvement are the following:

1. The presidents and other officials of the outstanding universities can no longer afford to be indifferent to accreditation, as many have been in recent years. Continued indifference to its effectiveness will further undermine its influence and lead eventually to the development of other forms of educational governance. These leading educators should recognize that our society has granted a privilege to higher education to conduct its own self-governance, that accreditation is the primary method by which this self-governance has been conducted, and that they more than other individuals in education have a definite social responsibility to assist in the improvement of accreditation and to see that it effectively fulfills its public obligations.

2. Despite obvious difficulties in reaching a consensus, the purposes of accreditation need to be redefined in the light of contemporary and future social demands. The accrediting agencies must be prepared to *prove* to the public, including congressional committees, that accreditation is fully meeting social needs and not merely following the desires and convictions of those who are conducting the many different accrediting programs. Can the public, especially prospective students and their parents, be expected indefinitely to be satisfied with such a statement, for example, that regional or general accreditation "applies to the entire institution" and "it indicates that each constituent unit is achieving its own particular aims satisfactorily, although not necessarily all on the same level of quality?"

3. For many years there has been much talk of the need for improved methods of measuring and identifying quality in education. This need still exists. It is high time that a cooperative and significant effort be made on the part of all accrediting agencies to find ways to improve their techniques of measurement and to refine the indices that will indicate quality of education.

Conclusion

Higher education—now so vital to the national welfare—will not be permitted to enjoy a privileged position in its self-governance unless it regularly and consistently places the welfare of society ahead of interest in the individual institution or the individual profession. When any segment of society fails adequately to monitor itself a public clamor for governmental controls develops. The drug, automobile, and tobacco industries are obvious current examples. With the increased importance of higher education, with a larger percentage of the growing population possessing academic degrees and certificates from these institutions, the public no longer considers itself incapable of proposing and requiring changes and improvements in higher education. It is to be expected that the public will eventually insist upon an external monitoring of higher education unless the accrediting associations are able collectively to reinvigorate accreditation and to do so with an emphasis on its responsibilities to national welfare.

There is considerable evidence that a reinvigoration is underway. Accrediting agencies are moving rapidly to add public, lay,

and related professional groups to their policymaking boards. Due process in accreditation is of growing concern. Standards and evaluation procedures are under increasing scrutiny to determine whether they are relevant, valid, and reliable measures. The Federation of Regional Accrediting Commissions of Higher Education is leading the way by undertaking, under the direction of Norman Burns, a study to seek new ways to validate standards or criteria employed in institutional accreditation.

Most importantly, accrediting agency officers and executives have come to a fuller understanding of the important role accreditation plays in society and they are reacting with expeditious enthusiasm.

Nongovernmental accreditation, tempered by more than a half century of heat from controversy and problems, has established its place in society. From a position of strength, it should now welcome and react favorably to constructive criticism.

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